



51 Corporate Woods, 9393 W. 110th St., Overland Park, Kansas 66210, (913) 451-3100

December 19th, 1990

Mr. Steve Broslavick, P.E.
Hazardous Waste Section
Bureau of Air & Waste Management
Kansas Department of Health &
Environment
Bldg 740
Forbes Field
Topeka, KS 66620

RECEIVED

DEC 21 1990

PRMT-SECTION

RE: Class 1 Permit Modification-
Revised Contingency Plan
Olin Water Services
Kansas City, Kansas
EPA ID: KSD000203638

Dear Mr. Broslavick:

In accordance with the provisions of 40 CFR 270.42, this letter is being written to notify the Department of a Class 1 permit modification being made to the RCRA Part B - Hazardous Waste Permit for the above referenced facility.

Specifically we are revising the contingency plan portion of the permit, copy of which is attached, to reflect 1) changes in personnel at the facility, 2) new 24 hour emergency telephone number, 3) revision to the list of contracted emergency response firms, and 4) revised site diagrams.

We believe these changes fall under the descriptions in 40 CFR 270.42, Appendix I, A) General Permit Provisions 1) Administrative and informational changes and B) General Facility Standards 6) Contingency plan-b) Replacement with functionally equivalent equipment and d) Changes in name, address or phone numbers of coordinators.

After reviewing the attached plan we would appreciate written confirmation that the revised contingency plan has been submitted and accepted by the Department in accordance with the regulations.

If there are any questions about this request, please contact me at (913) 451-3100.

Thank you for your attention to this matter.

Sincerely,
OLIN WATER SERVICES
DREW INDUSTRIAL DIVISION

L.M. Prouty
L.M. Prouty

Manager, Regulatory Affairs

CC: Mr. David Wagoner
U.S. Environmental Protection Agency
Region VII
726 Minnesota Ave.
Kansas City, KS 66101

Mr. Jim Fischer
Inspections and Enforcement Section
Bureau of Waste Management
Kansas Department of Health & Environment
808 West 24th Street
Lawrence, KS 66046-8417

Revised 4/84, 6/84, 9/85, 6/86, 12/90
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HAZARDOUS WASTE MANAGEMENT
Contingency Plan for Olin Water Services
Kansas City Plant

I. Emergency coordinators (in order that they are to assume responsibility as alternates):

A. William Dame

1. Telephone Numbers

a. Office: (913) 621-6440

b. Home: [REDACTED] [REDACTED] Ex. 6 PII

2. Home Address

[REDACTED] [REDACTED] Ex. 6 PII

B. Donald A. Christman

1. Telephone Numbers

a. Office: (913) 621-6460

b. Home: [REDACTED] [REDACTED] Ex. 6 PII

2. Home Address

[REDACTED] [REDACTED] Ex. 6 PII

C. Olin Water Services 24 Hour Emergency Phone Number

1-800-274-5263 (1-800-ASHLAND)

NOTE: The emergency coordinator has the authority to commit the resources needed to carry out the contingency plan.

II. Arrangements with fire department, ambulance service, hospitals, etc.

A. Fire Department

The Kansas City, Kansas Fire Department toured the Olin Water Services plant and hazardous waste storage area on June 13, 14, and 15 1983 in order to gain familiarization with facility layout and the properties of the hazardous wastes stored at the facility. A copy of the June 16, 1983 letter from Mr. Fred L. Brown, Assistant Fire Marshal, confirming this visit is attached. The Fire Department's local station is two blocks away from the plant and can be contacted in the event of a fire or other emergency by activating a fire box switch (see attached diagram of 3155 Fiberglas Road building) or by calling 911.

B. Ambulance Service

An ambulance service known as KARE which functions in conjunction with the Kansas City, Kansas Fire Department is automatically dispatched whenever the fire department is contacted at 911 and injuries reported.

C. Hospital

Arrangements have been made for immediate delivery of medical services to Olin Water Services personnel taken to either of the following medical care centers:

1. Bethany Medical Center
51 N. 12th Street
Kansas City, Kansas
2. Business and Industry Health Clinic
301 Funston
Kansas City, Kansas

The KARE Unit referred to above will take injured personnel to Bethany Medical Center. Less serious injuries for which ambulance transportation is not necessary can be treated at either the Business and Industry Health Clinic or Bethany Medical Center. The Business and Industry Health Clinic is equipped to handle most emergencies and should be used whenever possible; prior to going to the Business and Industry Health Clinic contact should be made with Peggy Andrade, Nursing Coordinator, or, in her absence, the doctor assuming her responsibilities at 321-2420.

attended the tour of the plant and facility in June of 1983, as described above in IIA. The Department of Police will provide back-up assistance to the Fire Department in the event of an emergency in which the Fire Department is called in. The attached letter dated June 15, 1983 from Mr. Allan Meyers, Chief of Police, confirms the above.

E. Emergency Response Contractors/Equipment Suppliers

See attached description of arrangements with emergency response contractors/equipment suppliers (Attachment 3 to the contingency plan).

III. Emergency Equipment

- A. Fire hoses at strategic locations with 110 pounds line pressure (see diagram of 3155 Fiberglas Road building).
- B. Ten pound class ABC hand fire extinguishers (see diagrams of both buildings).
- C. Siren alarms with five activating switches (see diagram of 3155 Fiberglas Road building).
- D. Numerous telephones in both buildings.
- E. A.D.T. monitored sprinkler system in both buildings.
- F. Emergency showers and eye wash stations (see diagrams of both buildings).
- G. First aid kits, stretcher and emergency oxygen (see diagrams of both buildings).
- H. Two Scott Air Packs with self contained breathing air (one for each foreman's office).
- I. Two AMBU resuscitators for manual mouth resuscitation (one in each foreman's office).
- J. Two pieces of liquid vacuum equipment each with 55 gallon capacity (one in each building).
- K. Four dozen MSA respirators with all appropriate NIOSH approved cartridges in the 305 Sunshine Road supply room.
- L. Neoprene knee high boots, MSA neoprene rain suits, gloves, goggles, safety glasses, etc. in the 305 Sunshine Road supply room.
- M. 1000 pounds of Dri-Sorb and vermiculite stored in both buildings.

IV. Evacuation

- A. Evacuation is signaled by two siren alarms which can be switched out at any of four activating switches in the 3155 Fiberglas Road building (see diagram).
- B. Evacuation routes are designated with large arrows on the attached building diagrams.
- C. Meeting Area - In case of evacuation all employees are instructed to meet on the northwest corner of Sunshine Road and Fiberglas Road.

V. Fire Emergency Procedures

- A. Fire alarms are to be activated to signal for plant evacuation. All persons are to evacuate to a point outside of the plant by the nearest marked exit route (see diagrams) and, if possible, upwind from the fire with the exception of plant operating personnel familiar with and trained to use fire fighting equipment.
- B. Fire Department is to be called by activating one of the two fire boxes or calling 911. If there are any injuries, the above number should be used to report both the fire and the injuries.
- C. Emergency coordinator is to determine whether or not trained personnel should contain the fire with on-site equipment until the fire department arrives.
- D. If the emergency coordinator determines that the fire cannot be safely contained by trained Olin personnel, then he is to instruct all personnel to evacuate the fire area and to direct the Fire Department to the fire on its arrival.
- E. Emergency coordinator will identify the character, source, quantity, and areal extent of any releases of hazardous materials and the potential hazards, if any, posed to human health or the environment.
 - 1. If the emergency coordinator determines that a release that could threaten human health or the environment off-site may have occurred, he will report this finding as follows:
 - a. Notify the National Response Center immediately at 800-424-8802 and report the following information:
 - 1) Name and telephone number of the reporter;
 - 2) Name and address of the plant;
 - 3) Time and type of incident (fire);

- 4) Name and quantity of materials involved, to the extent known;
 - 5) Extent of injuries, if any; and
 - 6) Possible hazards to human health or the environment, off-site.
- b. Notify the City of Kansas City Water Pollution Control Department (537-5400).
 - c. Notify the Kansas Department of Health and Environment (1-862-9360).
2. If it is determined that evacuation of local areas may be advisable, the emergency coordinator will so inform the Fire Department.
- F. Emergency coordinator is to determine what reasonable measures can be safely undertaken to move to safety any hazardous materials threatened by potential spread of the fire and to take any other measures appropriate for reducing the possibility of the fire spreading.

VI. Spill/Release Emergency Procedures

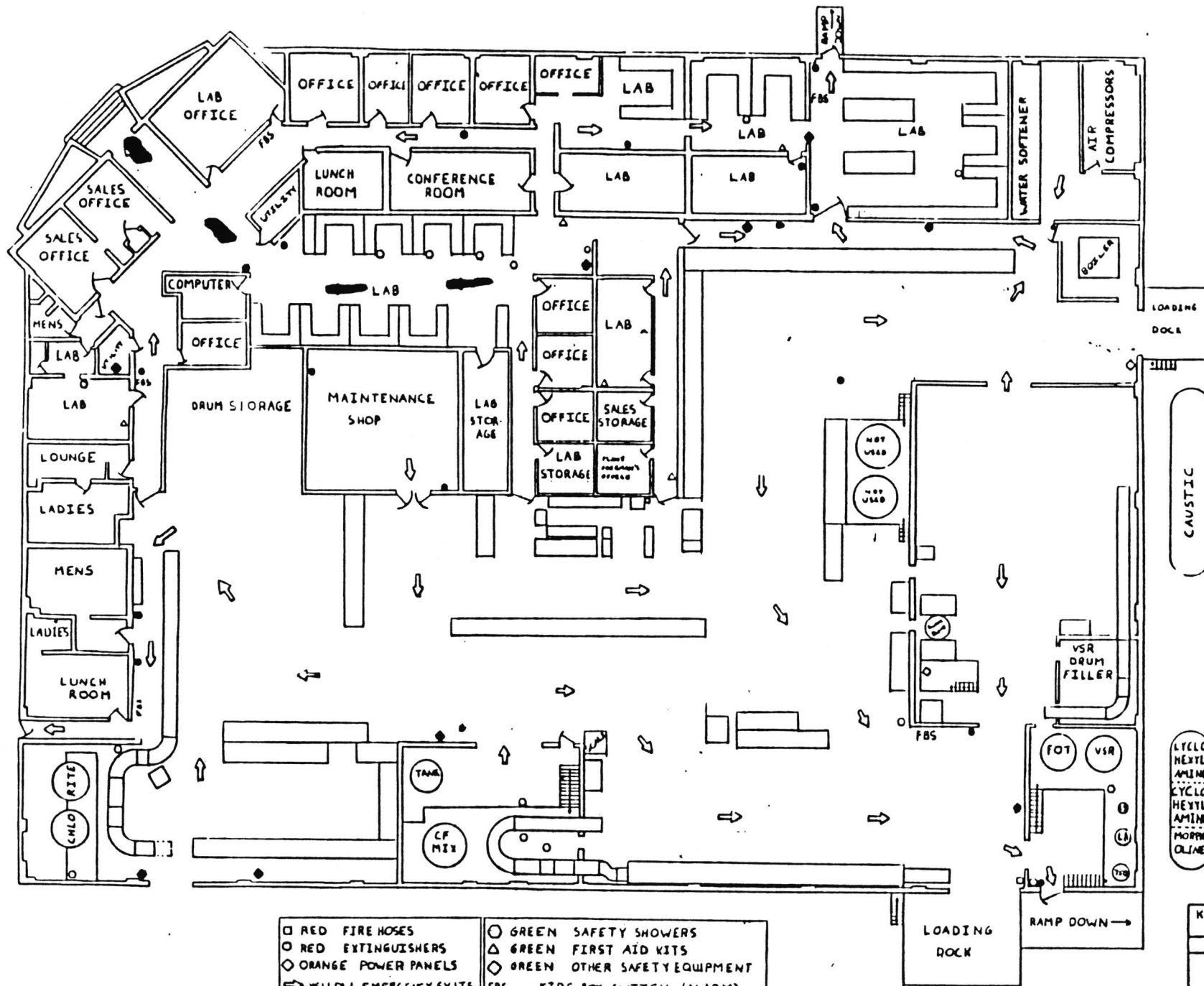
- A. Emergency coordinator is to determine whether or not Olin Water Services personnel should contain or impede the spill or release by application of inert sorbent material. In most cases, a spill or release will be due to failure of a container of no more than 55 gallon capacity, so direct response by Olin personnel will be appropriate.
- B. If emergency coordinator determines that outside assistance is necessary, he will contact the Fire Department and/or emergency response contractor, as appropriate.
- C. If emergency coordinator determines that the spill or release involves the generation of noxious or hazardous vapors or fumes, he will instruct all personnel to evacuate the area of the spill or release and will direct the Fire Department and/or emergency response contractor to the spill or release on arrival.
- D. Olin personnel assigned by the emergency coordinator to spill cleanup will use inert sorbent material, liquid vacuum equipment, and shovels or scoops to recover and re-contain released material.
- E. Emergency coordinator will identify the character, source, quantity, and areal extent of any releases of hazardous materials and the potential hazards, if any, posed to human health or the environment.
 1. If the emergency coordinator determines that a release that could threaten human health or the environment off-site may have occurred, he will report this finding as follows:

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- a. Notify the National Response Center immediately at 800-424-8802 and report the following information:
 - 1) Name and telephone number of the reporter;
 - 2) Name and address of the plant;
 - 3) Time and type of incident (fire);
 - 4) Name and quantity of materials involved, to the extent known;
 - 5) Extent of injuries, if any; and
 - 6) Possible hazards to human health or the environment, off-site.
 - b. Notify the City of Kansas City Water Pollution Control Department (573-5400).
 - c. Notify the Kansas Department of Health and Environment (1-862-9360).
2. If it is determined that evacuation of local areas may be advisable, the emergency coordinator will so inform the Fire Department.
- F. Emergency Coordinator is to determine what reasonable measures can be safely undertaken to move to safety any hazardous materials threatened by potential spread of the fire and to take any other measures appropriate for reducing the possibility of the fire spreading.
- VII. First aid may be administered, if appropriate, by one of the following first-aid officers who are qualified by Red Cross training:
- A. Niles Seawood (Lab Supply)
 - B. Tom Hicks (Plant)
 - C. Bill Whiles (Plant)
- VIII. Post-Emergency Procedures
- A. Immediately after an emergency must provide for the appropriate on-site storage of off-site management of any material that resulted from the emergency.
 - B. Emergency coordinator will ensure that cleanup is complete and all emergency equipment has been fully returned to service before any waste management operations are resumed.

- C. Olin will notify the Region VII Regional Administrator and the Secretary of the Kansas Department of Health and Environment that conditions are as described above in VIII.B. before operations are resumed at the facility.
- D. The emergency coordinator or the Plant Manager will note in the operating record the time, date, and details of any incident that requires contingency plan implementation.
- E. Within 15 days after any incident requiring implementation of the contingency plan, Olin will submit a written report on the incident to the Region VII Regional Administrator including the following information:
 - Olin's name, address, and telephone number;
 - Name, address, and telephone number of the Olin Water Services' Kansas City, Kansas plant;
 - Date, time and type of incident;
 - Name and quantity of materials involved;
 - The extent of injuries, if any;
 - An assessment of actual or potential hazards to human health or the environment, where applicable;
 - Estimated quantity and disposition of recovered material that resulted from the incident.

ATTACHMENTS 1, 2, 3, 4 and 5

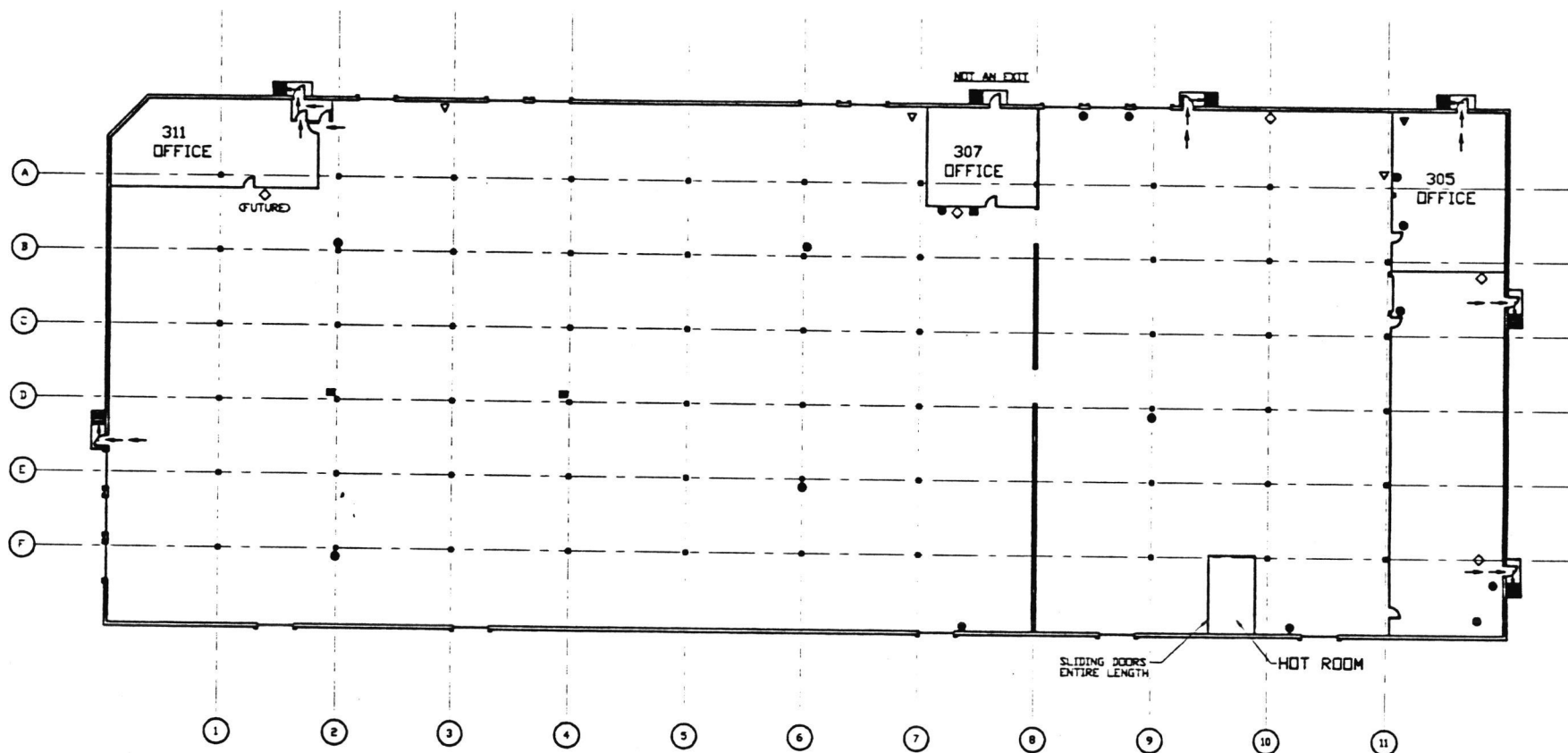


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|--|---|
| <ul style="list-style-type: none"> □ RED FIRE HOSES ○ RED EXTINGUISHERS ◇ ORANGE POWER PANELS → YELLOW EMERGENCY EXITS | <ul style="list-style-type: none"> ○ GREEN SAFETY SHOWERS △ GREEN FIRST AID KITS ◇ GREEN OTHER SAFETY EQUIPMENT FBS FIRE BOX SWITCH (ALARM) |
|--|---|

LYCLO
HEYL
AMINE
CYCLO
HEYL
AMINE
MORPH
OLINE

KANSAS CITY PLANT LAYOUT

Oil



KEY

- = FIRE EXTINGUISHER
- = FIRE HOSE
- ▼ = 1st AID KIT
- = EXIT
- ▽ = POWER PANELS
- ◇ = SAFETY SHOWER

RAIL SPUR

SUNSHINE RD.

Attachment 2
270.14(b)(7)

Rev.

90

REV.	DATE	DRN	CHK'D	REVISIONS DESCRIPTION	APPR.
ASHLAND CHEMICAL, INC. SUBSIDIARY OF ASHLAND OIL, INC.					
APPROVED FOR CONST.	REV.	LOCATION	TITLE		
BY	DATE	UNIV-BLDG	FIRE PROTECTION PLAN		
		305 WAREHOUSE	(DREW CHEM.)		
		DRN	150' X 400'		
		DATE	10/26/90		
		CHK'D			
		DATE			
		SCALE	1/16"=1'-0"		
		PLOT	192		
AFE	CAD FILE NO.	YD-001	VAULT FILE NO.		
			A		

ARRANGEMENTS WITH EMERGENCY RESPONSE CONTRACTORS/
EQUIPMENT SUPPLIERS

Ashland Chemical, Inc. has incident of response contracts with the following emergency response contractors/equipment suppliers who can provide service in the Kansas City area:

- 1) Riedel Environmental Services
- 2) Chemical Waste Management; and,
- 3) Ashland Environmental Services

Under these contracts, emergency response services for fires, spills, or releases at the Olin Water Services, Kansas City, Kansas facility are available.



CITY OF KANSAS CITY, KANSAS

FIRE DEPARTMENT

IN REPLY REFER TO
LAWRENCE D. BOWERS, CHIEF

JOHN E. REARDON, MAYOR

June 16, 1983

Mr. Glen D. Jenkins
Plant Manager
Olin Corporation
3155 Fiberglass
Kansas City, KS

Dear Mr. Jenkins,

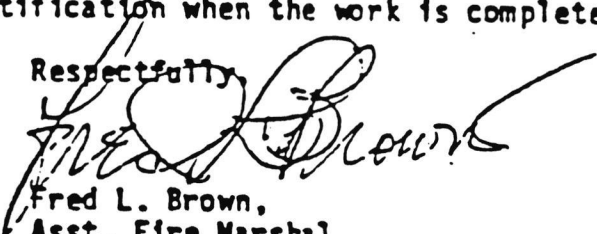
The on site walk through of your plant operation and storage area on June 13, 14 & 15th, 1983, will be beneficial not only to the Fire Department and the stations that will respond on a first alarm in an emergency situation, but also to the Olin Corporation as well.

Your contingency plan for hazardous waste in conjunction with the EPA approval for some sort of diking to control, contain and isolate, will be beneficial and helpful of containment.

Placement of new tanks for storage and the shut off valves to be relocated to the outside away from buildings.

This Department would like notification when the work is completed.

Respectfully,


Fred L. Brown,
Asst. Fire Marshal
K. C. K. F. D.

FLB/t1

*City of Kansas City, Kansas*

DEPARTMENT OF POLICE

June 15, 1983

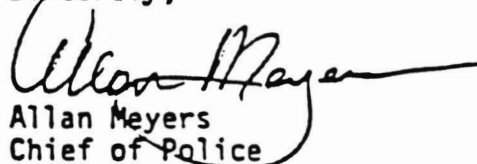
Mr. Glen D. Jenkins
51 Corporate Woods
9393 W. 110th
Overland Park, Kansas 66210

Dear Mr. Jenkins:

Per the arrangement made by Sgt. Ronald Miller of my staff, Captain Charles Steele, of our department, and members of the K.C.K. Fire Department toured your facility at 3155 Fiberglass to familiarize themselves with the layout properties of the hazardous waste, entrances, etc., that are required by Title 40.

This letter will confirm their visit and advise you that the Kansas City, Kansas Police Department will respond to your facility should the need arise. Our role in such a response would be to assist the Fire Department.

Sincerely,



Allan Meyers
Chief of Police

AM:bjs

RECEIVED

JUN 27 1983

M. W. PELLEY